7-22-86

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 22 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANC

MEMORANDUM

SUBJECT: PP #4E2998 (RCB #770) Vinclozolin in/on tomatoes, cucumbers, and peppers. Amendment of 4/4/86. Accession No. 262186.

FROM: Cynthia Deyrup, Ph.D., Chemist
Tolerance Petition Section 2
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

Cynthia Deyrup

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: Henry Jacoby, Product Manager #21
Registration Division (TS-767)

and

Toxicology Branch
Hazard Evaluation Division (TS-769)

Background

BASF Corporation had proposed the establishment of permanent tolerances for residues of the fungicide vinclozolin [3-(3,5-dichlorophenyl)-5-ethenyl-5-methyl-2,4-oxazolidinedione] and its metabolites containing the 3,5-dichloroaniline moiety in/on imported tomatoes at 2.0 ppm and imported cucumbers at 1.0 ppm. The amendment of 7/31/84 proposed to also establish a tolerance for vinclozolin and its metabolites containing the 3,5-dichloroaniline moiety in/on imported green peppers at 3.0 ppm. That amendment did not address the deficiencies cited by RCB in its review of the original submission, which had been rejected (PP #4E2998, memo of J.H. Onley, 3/30/84). The amendment to establish a tolerance on imported green peppers was also rejected because of a number of deficiencies (PP #4E2998, memo of C. Deyrup, 10/17/84).

Present Submission

The present submission consists of the petitioner's response to

the deficiencies cited in RCB's 10/17/84 review of the amendment of 7/31/84 (memo of C. Deyrup), translations of Dutch, Italian, and Spanish labels, resubmitted and additional residue data, and a revised Section G (Reasonable Grounds in Support of a Petition). The deficiencies cited by RCB in its reviews of 3/30/84 (memo of J.H. Onley) and 10/17/84 (memo of C. Deyrup) will be restated followed by the petitioner's responses and RCB's Comments/Conclusions.

Deficiency 1, Memo of J.H. Onley, 3/30/84 (Tomatoes and Cucumbers)

The petitioner will need to provide pertinent English translations of the proposed product labels from the Netherlands, Federal Republic of Germany, Spain, and Italy. The application rate(s) on each label should be given in terms of active ingredient per ha since the residue data are rightfully reported in this way.

Deficiency 1a, Memo of C. Deyrup, 10/17/84 (Green Peppers)

RCB requests information on the treatment rate in terms of weight per unit area and the number of applications per growing season in Great Britain. Since this information is not on the label, RCB needs to know how this information will be conveyed to the applicator.

Deficiency 1b, Memo of C. Deyrup, 10/17/84 (Green Peppers)

The petitioner should also submit labels, supported by residue data, for all other countries where he intends to use his product (Belgium, Costa Rica, Italy, Jordan, and Japan). Although the petitioner has included a label and residue data from France, Ronilan is not registered for use on peppers in that country. The petitioner will need to provided pertinent English translations for all labels. Dutch and Hungarian translations are needed for the labels submitted with this amendment. RCB will need information on the treatment rate in terms of weight per unit area, the number of applications per growing season, and the proposed PHI. If this information is not on the label, RCB needs to know how this information will be conveyed to the applicators. Also, there seems to be no reference for use on peppers on the Dutch label.

Petitioner's Response: re Deficiencies 1, 1a, and 1b

The petitioner has submitted English translations for the use of Ronilan on tomatoes, green peppers, and cucumbers in the Netherlands, Spain, and Italy. Additional residue data on tomatoes (Holland, Italy), cucumbers (Holland) and peppers (Holland) were also submitted. The petitioner believes that the need for residue data from Belgium can be covered by the residue data from the Netherlands. The petitioner has submitted a table of export statistics in Section G to support his contention that Great Britain, Costa Rica, Jordan, Japan, Greece, the Federal

Republic of Germany, France, and Hungary do not export significant amounts of cucumbers, peppers, and/or tomatoes to the US; therefore the petitioner considers it unnecessary to submit use directions, labels, and residue data from these countries.

The translated label directions are outlined below.

Netherlands-Gherkins, Cucumbers, Tomatoes, and Sweet Peppers

The subject crops are to be treated with Ronilan from the onset of disease at 7 to 10 day intervals. A 3 day PHI is imposed. The crops are to be treated at a rate of 50 g formulation per 100 l water.

Spain-Tomatoes, Peppers, Cucumbers

The subject crops are to be treated with Ronilan 50 WP at a rate of 50 to 100 g formulation/100 l water. Up to 1000 l of dilute spray per hectare are permitted (up to 0.5 kg a.i./ha). Treatments are to be made at intervals which depend upon the climatic conditions and the degree of infection. When spraying at very short intervals, the lower rate should be used. A 15 day PHI is imposed.

Italy-Tomatoes

Tomatoes are to be treated with Ronilan 50 WP at a rate of 50-80 g formulation/100 l. The quantity applied depends on the stage of development of the plant. Plants may be treated with 600-800 l/ha up to the second truss flower stage (up to 0.32 kg a.i./ha) and 1000-1500 l/ha (up to 0.6 kg a.i./ha) after that stage. A 21 day PHI is imposed. The treatment interval is 10-15 days.

RCB's Comments/Conclusions

In order to establish a tolerance on imported commodities, the countries in which the pesticide is to be used must be specified. That is, a blanket U.S. import tolerance is not established on imported tomatoes from every country, but on tomatoes that will be imported from those countries where the proposed uses have been substantiated by residue studies. For example, available information indicate that Ronilan is not used on the subject crops in Mexico, which is, by far, the most important exporter of these crops. Establishing a tolerance on imported tomatoes, without specifying the point of origin, could have the following consequences:

1) Mexican tomatoes would also be covered if, sometime in the future, Mexico were to register Ronilan for use on tomatoes, even if no additional residue data were submitted to RCB; residues which are over the established tolerance could result.

2) Countries such as Venezuela and Israel, in which Ronilan is registered for use on the subject commodities, would also be able to export the subject crops to the US, although no residue data or knowledge about the usage patterns in these countries are available to RCB at this time.

Therefore, the petitioner will need to submit a revised Section B in which he spells out only those countries that he wants to be covered by the proposed import tolerance. Residue studies must, of course, have been carried out in those countries. If residue studies have not been conducted in a particular country, then that country should not be included in the revised Section B. RCB notes that in Section G, the petitioner states that his petition is "...principally intended to cover tomatoes, peppers, and cucumbers exported to the U.S.A. for the fresh market from the Netherlands." Appropriate labels, translations, and residue data reflecting the petitioner's intent should also be submitted. Pending the receipt and review of a revised Section B in which the petitioner specifically names the countries whose crops are to be covered by the proposed tolerances, Deficiencies 1 (memo of J. Onley, 3/30/84), 1a, and 1b (memo of C. Deyrup, 10/17/84) remain unresolved.

In addition, RCB has the following comments on the submitted labels.

Netherlands

Neither the number of treatments permitted to the subject crops per season nor the dosage in terms of weight per unit area has been specified. RCB needs this information in order to determine whether the residue data reflect the proposed use. Also, since this information is not on the label, the petitioner needs to inform RCB on how details of the proposed use will be conveyed to the applicators.

The amendment of 7/31/84 proposed the use of Ronilan FL and Ronilan 50 WP on green peppers. The original submission proposed the use of Ronilan 50 WP on tomatoes and cucumbers. RCB needs to know if the translated Dutch label is a translation of the Ronilan FL label or of the Ronilan 50 WP label.

An English translation is also needed of any other label proposed for use on the subject crops.

RCB needs to know whether the petitioner intends Ronilan to be used in the open field as well as in greenhouses. The residue data appear to reflect mostly greenhouse trials.

Spain

Neither the number of treatments permitted to the subject crops per season nor the treatment interval appears on the label.

Since this information is not on the label, RCB needs to know how details of the proposed use will be conveyed to the applicators. The label indicates that use of Ronilan in the open field is permissible, although the residue data generally reflect greenhouse trials. RCB needs to know the petitioner's intent.

Italy

The number of treatments permitted to tomatoes per season does not appear on the label. RCB needs this information in order to determine whether the residue data reflect the proposed use. Also, since this information is not on the label, RCB needs to know how details of the proposed use will be conveyed to the applicators. The label indicates that use of Ronilan in the open field is permissible, although the residue data generally reflect greenhouse trials. RCB needs to know the petitioner's intent.

Deficiency 1c, Memo of C. Deyrup, 10/17/84 (Green Peppers)

For Japan, the tolerance level for Ronilan residues on peppers is 5.0 ppm, which is higher than the 3.0 tolerance level proposed by the petitioner. There appears to be a compatibility problem.

Petitioner's Response: re Deficiency 1c

The petitioner contends that Japanese peppers are not relevant to his proposal because Japan does not export peppers to the US, the registered use pattern is different, and Japan has a "unique method" for calculating tolerances.

RCB's Comments/Conclusions

Since the petitioner had not named the countries whose peppers were to be covered by the proposed tolerance in his submission of 7/31/84, RCB was unable to discern the petitioner's intent. Again, RCB emphasizes that the petitioner should specify those countries whose peppers are to be covered by the proposed import tolerance in a revised Section B (see RCB's discussion under the Petitioner's response to Deficiencies 1, 1a, and 1b). Deficiency 1c (memo of C. Deyrup, 10/17/84) is not yet resolved.

Deficiency 2, Memo of C. Deyrup, 10/17/84 (Green Peppers)

The petitioner will need to submit sample chromatograms reflecting fortified and unfortified crop samples.

Petitioner's Response: re Deficiency 2

The petitioner has submitted representative chromatograms of fortified and unfortified samples of cucumbers, tomatoes, and green peppers.

RCB's Comments/Conclusions

Deficiency 2 (memo of C. Deyrup, 10/17/84) is resolved.

Deficiency 3a, Memo of C. Deyrup, 10/17/84 (Green Peppers)

The petitioner should describe storage conditions for the English (Sussex) study in which pepper samples were stored for 11 months.

Petitioner's Response: re Deficiency 3a

All samples were frozen when collected, packed in dry ice and shipped frozen, and remained frozen until analysis.

RCB's Comments/Conclusions

Deficiency 3a (memo of C. Deyrup, 10/17/84) is resolved.

Deficiency 3b, Memo of C. Deyrup, 10/17/84 (Green Peppers)

The petitioner should submit data reflecting analyses of check pepper samples.

Deficiency 4b, Memo of J.H. Onley, 3/30/84 (Tomatoes and Cucumbers)

The petitioner will need to submit residue data reflecting the analyses of some cucumber controls.

Petitioner's Response re: Deficiencies 3b and 4b

The petitioner has submitted additional residue data on cucumbers and green peppers. He has provided analyses of check samples of cucumbers; from the peak heights of the check samples, RCB estimates that the check values for cucumbers ranges from <0.05-0.05 ppm vinclozolin. For green peppers, the check values obtained ranged from 0.08-0.09 ppm. The petitioner has also submitted additional analyses and chromatograms of tomato check samples. For tomatoes, the check values obtained ranged up to 0.1 ppm.

RCB's Comments/Conclusions

The chromatograms of the check pepper samples exhibit a peak of significant size at the retention time of the analyte. According to the data sheets, these peaks correspond to a level of 0.08-0.09 ppm vinclozolin. No confirmatory data were submitted to indicate whether this peak was due to vinclozolin (resulting from drift) or whether it was a matrix interference. However, in view of the proposed tolerance of 3.0 ppm for green peppers,

RCB will conclude that the methodology used to generate the residue data was adequate and that Deficiencies 3b (memo of C. Deyrup, 10/17/84) and 4b (memo of J. Onley, 3/30/84) are resolved.

Deficiency 3c, Memo of C. Deyrup, 10/17/84 (Green Peppers)

The petitioner needs to submit pertinent representative chromatograms of treated and untreated pepper samples so that RCB can evaluate the residue data.

Petitioner's Response, re: Deficiency 3c

Representative chromatograms of treated and untreated pepper samples were submitted.

RCB's Comments/Conclusions

Deficiency 3c is resolved.

Deficiency 3d, Memo of C. Deyrup, 10/17/84 (Green Peppers)

The petitioner should also supply residue data from field trials carried out in all other countries where he intends to use vinclozolin (i.e. Belgium, Costa Rica, Italy, Jordan, and Japan), since the climatic conditions vary widely among these countries. The residue data should reflect the petitioner's proposed use in terms of PHI, application rate (expressed in weight per unit area), and number of applications per growing season for each country. The petitioner should describe storage conditions before analysis and should provide representative chromatograms so that RCB can evaluate the residue data.

Deficiency 4a, Memo of J. Onley, 3/30/84 (Tomatoes and Cucumbers)

In relation to Conclusion 1 above, we are not able to conclude whether or not the proposed tolerances on tomatoes and cucumbers grown in Spain, Greece, and Italy are adequate since no residue data reflecting the proposed use in those countries were submitted; the petitioner will need to submit residue data on the subject crops grown and harvested in Spain, Greece, and Italy.

Petitioner's Response, re: Deficiencies 3d and 4a

Based on the import statistics referenced in Section G, the petitioner has concluded that the only countries which export a significant amount of the subject commodities to the US are the Netherlands, Spain, and Italy. In Section G, the petitioner states that this petition is principally intended to cover the subject crops which are exported to the US from the Netherlands, although the data presented for the Netherlands also covers usage in Belgium. The petitioner also states that data from Spain and Italy have also been included to represent countries in the rest

of Europe and on the Mediterranean Sea. The petitioner claims that Central American countries may export the subject crops to the US, but the amount exported is insignificant. The petitioner points out that although Mexico is by far the most important exporter of the subject crops to the US, Ronilan is not registered for use in Mexico at this time.

The petitioner has also submitted additional residue data on cucumbers and green peppers from the Netherlands and additional tomato residue data from Italy and the Netherlands. This residue data, together with previously submitted residue data from the Netherlands and Italy, are presented below. Previously submitted data from Germany, England, and Denmark are not presented because these countries do not export significant amounts of the subject commodities to the US, according to the table submitted in Section G.

Cucumbers

The additional residue data are from 2 greenhouse trials in the Netherlands. Cucumbers were treated with 3 applications of Ronilan FL or Ronilan 50 WP at a rate of 1.25 kg a.i./A. The treatment interval was 8-11 days; a 3 day PHI was observed.

The proposed use (label) for cucumbers to be grown in the Netherlands permits an unlimited number of applications with a 0.05% spray. A treatment interval of 7-10 days is recommended. A 3 day PHI is imposed.

Present Submission

Site	Application rate (kg a.i./ha)	PHI (days)	Interval (days)	Residue level (ppm)
*Netherlands	3 x 1.25	3	8-11	0.22-0.53

Previous Submission

*Netherlands	1 x 0.8	3	-	0.5-1.0

*Greenhouse trials

Tomatoes

The petitioner has submitted additional tomato residue data from field trials conducted in the Netherlands (2 greenhouse studies; 3 x 1.0 kg a.i./ha; 3 day PHI) and Italy (3 greenhouse trials; 5 applications; total of 2.0-3.75 kg a.i./ha (0.24-1.0 kg/ha/application); PHI, 14-21 days). The trials in the Netherlands reflected applications of Ronilan FL or Ronilan 50 WP. The Italian trials reflected the application of Ronilan 50 WP.

The proposed use for tomatoes grown in the Netherlands permits an unlimited number of applications with a 0.05% spray. A treatment interval of 7-10 days is recommended. A 3 day PHI is imposed.

The proposed use for tomatoes grown in Italy permits an unlimited number of applications with a 0.05-0.08% mixture of formulation. The recommended treatment interval is 10-15 days. The amount to be applied depends on the growth stage of the tomatoes. Up to the development of the second truss flowers, tomatoes may be treated at a maximum rate of 800 l/ha (0.32 kg a.i./ha), and thereafter, at a rate of up to 1500 l/ha (0.6 kg a.i./ha). A 21 day PHI is imposed.

Present Submission

Site	Application rate (kg a.i./ha)	PHI (days)	Interval (days)	Residue level (ppm)
*Netherlands	3 x 1.0	3	8-11	0.76-1.11
*Italy	5 doses-total, 2.0-2.2 kg/ha; 0.2-0.6 kg/ha/dose	14	13-18	0.17
		21	13-18	0.11-0.17
*Italy	5 doses-total, 3.75 kg/ha; 0.4-1.0 kg/ha/dose	21	13-26	0.10

Previous Submission

*Netherlands	3 x 0.75	3	7	0.55-0.93
	5 x 0.75	3	7-12	0.48-0.83

* Greenhouse trials

Peppers

The petitioner has submitted residue data from 4 additional trials in the Netherlands reflecting treatment with Ronilan 50 WP or Ronilan FL. Two of the trials were greenhouse trials; the data sheets from the remaining two trials do not specify whether the trials took place under glass. The peppers received 3 applications of an 0.05% spray at a rate of 0.75 kg a.i./ha. A 9 day treatment interval and PHI's of 3 and 7 days were observed.

Previously submitted residue data on peppers were generated in England and France. According to the petitioner, these countries do not export peppers to the US.

The proposed use for peppers grown in the Netherlands permits an unlimited number of applications with a 0.05% spray. A treatment interval of 7-10 days is recommended. A 3 day PHI is imposed. The residue data are tabulated below.

Site	Application rate (kg a.i./ha)	PHI (days)	Interval (days)	Residue level (ppm)
Netherlands	3 x 0.75	3	9	0.60-1.05
	3 x 0.75	7	9	0.77-1.09

RCB's Comments/Conclusions re: Cucumber Residue Data

Because of label deficiencies regarding the use of Ronilan on cucumbers grown in the Netherlands, RCB can't determine whether the Dutch residue data reflect the proposed use. The petitioner needs to specify the number of applications permitted and the application rate in terms of kg/ha (see RCB's Comments/Conclusions under Deficiencies 1, 1a, and 1b) above.

Also, only one Dutch label translation was submitted. RCB needs translations of both the Ronilan FL and Ronilan WP formulations, if it is the petitioner's intent to permit cucumber treatment with these formulations in the Netherlands.

Residue data submitted from Dutch trials may only be used to support an import tolerance on cucumbers imported from the Netherlands. If it is the petitioner's intent to cover cucumbers grown in Spain and Italy under the proposed tolerance, residue data from these countries would also be needed.

If it is the petitioner's intent to permit application in the open field as well as in greenhouses, residue data reflecting field use would also be needed. The rate of Ronilan dissipation in greenhouses could differ from that in the field because of photodegradative processes, the method of watering, etc.

RCB concludes that the submitted residue data do not support a tolerance of 1.0 ppm on cucumber grown in the Netherlands, even if the residue data do indeed reflect the petitioner's proposed use. A vinclozolin residue level of 1.0 ppm was found in one trial involving a single application at a rate of 0.8 kg a.i./ha. The translated label permits an unlimited number of applications. The proposed use is too vague and the residue data are too scant (3 trials, under glass) to permit RCB to suggest a more appropriate tolerance. Additional residue data reflecting the proposed use are needed on cucumbers grown in the Netherlands. The petitioner

should correlate his proposed labels with his residue data (Note: residue data reflecting field studies are lacking).

RCB's Comments/Conclusions re: Tomato Residue Data

Because of label deficiencies regarding the use of Ronilan on tomatoes grown in the Netherlands, RCB can't determine whether the Dutch residue data reflect the proposed use. The petitioner needs to specify the number of applications permitted and the application rate in terms of kg/ha (see RCB's Comments/Conclusions under Deficiencies 1, 1a, and 1b). Since this information is not on the current label, RCB also needs to know how these restrictions will be conveyed to the applicator.

The petitioner also needs to specify the number of applications permitted to tomatoes grown in Italy so that RCB can determine whether the trial conditions reflected the proposed use.

Also, only one Dutch label translation was submitted. RCB needs translations of both the Ronilan FL and Ronilan WP formulations, if it is the petitioner's intent to permit tomato treatment with these formulations in the Netherlands.

If it is the petitioner's intent to permit application in the open field as well as in greenhouses, residue data reflecting field use would also be needed. The rate of Ronilan dissipation in greenhouses could differ from that in the field because of photodegradative processes, method of watering, etc.

If the petitioner intends to cover tomatoes grown in other countries with this import tolerance, he will need to submit residue data from that country.

RCB's Comments/Conclusions re: Pepper Residue Data

Because of label deficiencies regarding the use of Ronilan on green peppers grown in the Netherlands, RCB can't determine whether the Dutch residue data reflect the proposed use. The petitioner needs to specify the number of applications permitted and the application rate in terms of kg/ha (see RCB's Comments/ Conclusions under Deficiencies 1, 1a, and 1b). Since this information is not on the current label, RCB also needs to know how these restrictions will be conveyed to the applicator.

Also, only one Dutch label translation was submitted. RCB needs translations of both the Ronilan FL and Ronilan WP formulations, if it is the petitioner's intent to permit application of Ronilan

FL and 50 WP formulations to green peppers grown in the Netherlands.

Residue data submitted from Dutch trials may only be used to support an import tolerance on green peppers grown in the Netherlands. If it is the petitioner's intent to cover peppers grown in Spain and Italy under the proposed tolerance, residue data from these countries would also be needed.

If it is the petitioner's intent to permit application in the open field as well as in greenhouses, residue data reflecting field use would also be needed. The rate of Ronilan dissipation in greenhouses could differ from that in the field because of photodegradative processes, method of watering, etc.

RCB's Comments/Conclusions re: Residue Data

RCB concludes that Deficiencies 3d (memo of C. Deyrup, 10/17/84) and 4a (memo of J. Onley, 3/30/84) are not yet resolved for the following reasons:

1. Additional residue data reflecting the proposed use on cucumbers grown in the Netherlands are needed;

2. For cucumbers, peppers, and tomatoes grown in the Netherlands, RCB needs to know the maximum proposed application rate in terms of kg/ha and the number of applications permitted;

3. RCB needs to know the number of applications permitted to tomatoes grown in Italy;

4. RCB needs to know how information regarding the dosage and number of permitted applications will be transmitted to the applicators, since these details are not on the current labels.

5. If the petitioner intends to cover the subject crops grown in other countries (in addition to those countries from which he has submitted residue data), residue data from those countries need to be submitted.

6. If it is the petitioner's intent to permit application in the open field as well as in greenhouses, residue data reflecting field use would also be needed. The rate of Ronilan dissipation in greenhouses could differ from that in the field because of photodegradative processes, method of watering, etc.

Deficiency 3e, Memo of C. Deyrup, 10/17/84 (Green Peppers)

At this time RCB can draw no conclusions on the appropriateness

of the proposed 3.0 ppm tolerance of vinclozolin/metabolite residues on green peppers until the deficiencies discussed under Residue Data in the present amendment have been addressed (i.e., a lack of a description of storage conditions in the Sussex study, a lack of data for control values and chromatograms, and a lack of residue data from the other countries where the petitioner intends to use Ronilan on peppers).

Petitioner's Response and RCB's Comments/Conclusions

The petitioner's responses and RCB's Comments/Conclusions were detailed in the preceding sections of this review.

Deficiency 5, Memo of J. Onley, 3/30/84 (Tomatoes and Cucumbers)

The petitioner's tomato fractionation study showed a maximum Ronilan concentration of about 3X in tomato puree. In view of this, the petitioner should propose a food additive tolerance (which needs to be 3 times the value of the proposed tolerance on whole tomatoes) as follows:

Processed tomato products.....X ppm.

Petitioner's Response re: Deficiency 5

The petitioner did not address this deficiency.

RCB's Comments/Conclusions

This deficiency should be resolved. Ronilan is already registered for use on tomatoes in Italy, which is the major exporter of processed tomato commodities to the US and accounts for about 1/3 of the processed tomato commodities which are imported. The most recent figures indicate that about 120 million pounds of processed tomatoes (canned, paste, etc.) were imported from Italy (telecon of 7/3/86 with D. Hodgen, International Trade Association, US Department of Commerce).

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Other Considerations

Neither Codex, Canada, nor Mexico has established a tolerance for residues of vinclozolin on green peppers, tomatoes, or cucumbers. If the proposed tolerances are established, there will be no compatibility problem.

Recommendations

RCB recommends against establishing the proposed import tolerances for residues of vinclozolin on peppers at 3.0 ppm, tomatoes at 2.0 ppm, and cucumbers at 1.0 ppm. Deficiencies 1a, 1b, 1c, 3d, and 3e from the C. Deyrup memo of 10/17/84 and Deficiencies 1, 4a, and 5 from the J. Onley memo of 3/30/84 remain outstanding.

Note to PM: RCB suggests that the petitioner receive an

unabridged copy of this review.

cc: R.F., Circu, C. Deyrup, TOX, EEB, EAB, PP #4E2998, PMSD/ISB, FDA, PM 21
RDI: JH Onley:7/17/86:RDSchmitt:7/17/86
TS-769:CD:cd:7/17/86:RM 810:CM-2:X7484

INTERNATIONAL RESIDUE LIMIT STATUS

CHEMICAL Vinclozolin

PETITION NO. 4E2992

CCPR NO. _____

Reviewer: C. Deyrup
F. Suhre 7/10/86 confirmed

Codex Status

Proposed U.S. Tolerances

[✓] No Codex Proposal
Step 6 or above

Residue (if Step 9): _____

Residue: Vinclozolin + metabolites containing 3,5-dichloroaniline moiety

Crop(s)	Limit (mg/kg)

Crop(s)	Tol. (ppm)
green peppers	3.0
tomatoes	2.0
cucumbers	1.0

CANADIAN LIMIT

Residue: _____

Crop	Limit (ppm)
None	

MEXICAN TOLERANCIA

Residue: _____

Crop	Tolerancia (ppm)
None	

NOTES: